

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY  
CAMDEN VICARAGE**

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In Re: Valsartan, Losartan, And  
Irbesartan Products  
Liability Litigation

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MDL No. 2875  
Honorable Robert B. Kugler,  
District Court Judge

This Document Relates To:

Judge Joel Schneider  
Magistrate Judge

Gatson J. Roberts, Jr. and wife  
Jan Roberts  
Case No. 1:20-cv-00946-RBK-JS

**MOTION TO SUBSTITUTE PARTIES**

COMES NOW Plaintiff, Jan Roberts, by and through undersigned counsel, pursuant to Rule 25(a)(1) of the Federal Rules of Civil Procedure and moves the Court to substitute Jan Roberts, Personal Representative of the Estate of Gaston Roberts, Jr, as Plaintiff for decedent, Gaston Roberts, Jr. As grounds for said motion, Plaintiff states as follows:

1. Plaintiffs Gaston Roberts, Jr. and Jan Roberts filed their original complaint against Defendants on January 29, 2020 in the United States District Court District of New Jersey.
2. During the pendency of the lawsuit, Plaintiff Gaston Roberts, Jr died on March 17, 2020 of liver cell carcinoma.
3. A Notice of Death was filed in this Court on September 1, 2020.
4. Plaintiff Jan Roberts, wife of decedent Plaintiff Gaston Roberts, Jr., was appointed the Personal Representative of the Estate of Gaston Roberts, Jr. by the Circuit Court for

Baldwin County, Alabama on June 10, 2020. A copy of the Letters of Administration are attached hereto as Exhibit A.

5. Under Alabama law, the filed personal injury claims of Gaston Roberts, Jr survive his death and may be prosecuted by his estate along with a claim for wrongful death.

WHEREFORE, Plaintiff Jan Roberts, who has been appointed the Personal Representative for the Estate of Gaston Roberts, Jr, moves the Court to enter an Order substituting Jan Roberts as Personal Representative of the Estate of Gaston Roberts, Jr. as the Plaintiff for the decedent, Gaston Roberts, Jr. A Proposed Order is filed herewith.

Dated this the 5<sup>th</sup> day of October, 2020.

Respectfully submitted,

/s/Don McKenna

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Attorney for the Plaintiffs

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that a copy of the foregoing was served electronically via **the Court's ECF system** on attorneys of record on the 5<sup>th</sup> day of October, 2020.

/s/Don McKenna  
Attorney for Plaintiffs